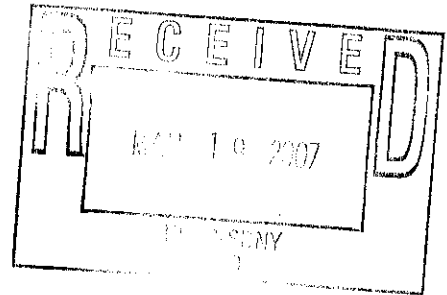


Michael C. Moody, Esq.  
O'ROURKE KATTEN & MOODY  
161 N. Clark Street, Suite 2230  
Chicago, IL 60601  
(312)849-2020  
(312)849-2021 Fax  
[mmoody@okmlaw.com](mailto:mmoody@okmlaw.com)  
[firm@okmlaw.com](mailto:firm@okmlaw.com)



Attorney for SBC C Services

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X	
IN RE:	:
	:
Delphi Corporation, et al.,	:
	:
Debtors.	:
-----X	

CHAPTER 11

CASE NO. 05-44481(RDD)

**SBC GLOBAL SERVICES' RESPONSE TO DEBTORS' NINTH OMNIBUS CLAIMS  
OBJECTIONS PURSUANT TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007**

SBC Global Services ("SBC") hereby submits this Response to Debtors' Ninth Omnibus Claims Objections Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007, and in support thereof, states as follows:

1. On or about October 8 and 14, 2005, Delphi Corporation and certain of its subsidiaries and affiliates (collectively, the "Debtors") filed voluntary petitions in this Court for reorganization relief under Chapter 11 of the Bankruptcy Code, 11 U.S.C. §§ 101-1330.

2. SBC is engaged in the business of, *inter alia*, leasing equipment and providing services related thereto. SBC filed its proof of claim in this matter on or about July 31, 2006, on the basis of an equipment and services lease between SBC and the Debtors.

3. The lease at issue was part of a complex group of transactions pursuant to which a large volume of paperwork was generated. Despite a diligent search, SBC was unable to locate the Lease and attach it to its proof of claim.

4. In its Ninth Omnibus Objection to Claims, Debtors have objected to SBC's claim because SBC has provided insufficient documentation to support the claim.

5. SBC is currently performing a diligent search of its records in an effort to locate the lease between the parties and provide this Court with proper documentation thereof.

6. Once SBC locates the relevant documents, it will provide this Court with a supplemental response sufficiently documenting the lease transaction and amounts due thereunder.

Dated: Chicago, IL  
March 15, 2007

**O'ROURKE KATTEN & MOODY**

By: /s/ Michael C. Moody, Esq.

Michael C. Moody

161 N. Clark Street, Suite 2230

Chicago, IL 60601

(312)849-2020

(312)849-2021 Fax

[mmoody@okmlaw.com](mailto:mmoody@okmlaw.com)

[frm@okmlaw.com](mailto:frm@okmlaw.com)

*Attorneys for SBC Global Services*

**CERTIFICATE OF SERVICE**

I, Michael C. Moody, Esquire, do hereby certify that on the 15<sup>th</sup> day of March, 2007, a true and correct copy of SBC Global Services response to Debtors Ninth Omnibus Objection to claims were served electronically or via USPS, postage prepaid on the parties listed below:

Delphi Corporation  
Attn. Corporate Counsel  
5725 Delphi Drive  
Troy, MI 48098

John Wm. Butler, Jr.  
John K. Lyons  
Joseph N. Wharton  
Skadden Arps Slate Meagher & Flom, LLP  
333 West Wacker Drive, Suite 2100  
Chicago, IL 60606

Dated: Chicago, IL  
March 15, 2007

**O'ROURKE KATTEN & MOODY**

By: /s/ Michael C. Moody, Esq.  
Michael C. Moody  
161 N. Clark Street, Suite 2230  
Chicago, IL 60601  
(312)849-2020  
(312)849-2021 Fax  
[mmoody@okmlaw.com](mailto:mmoody@okmlaw.com)  
*Attorneys for SBC Global Services*